

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

NICOLE TAYLOR REED,	)	
	)	CIVIL ACTION NO.
Plaintiff,	)	
	)	2:06-CV-00380-MHT-CSC
v.	)	
	)	
BIG LOTS STORES, INC.,	)	
	)	
Defendant.	)	
	)	

**DEFENDANT BIG LOTS STORES, INC.'S MOTION FOR EXTENSION OF TIME**

Defendant Big Lots Stores, Inc. ("Big Lots"), by and through undersigned counsel, respectfully moves the Court for a brief extension of time, through and including March 16, 2007, in which to file its Motion for Summary Judgment.

In support of this Motion, Big Lots states as follows:

1.

Pursuant to the Court's December 8, 2006 Order, dispositive motions are due to be filed on or before February 28, 2007.

2.

Due to scheduling issues and obligations in other matters, counsel for Big Lots requests a short extension of time in which to submit its Motion for Summary Judgment.

3.

Counsel for Big Lots has spoken to Plaintiff regarding the requested extension, and she stated she has no objection to the requested extension.

4.

This Motion is being filed prior to the deadline for filing dispositive motions.

5.

The requested extension is not being made for any improper purpose or to delay or otherwise prejudice the rights of any Party.

6.

The requested extension will not delay the trial of this case, as this matter currently has not been set for trial.

THEREFORE, Big Lots respectfully asks the Court for a brief extension of time, through and including March 16, 2007, in which to file its Motion for Summary Judgment.

Respectfully submitted this 13th day of February, 2007.

Stephen X. Munger  
Georgia Bar No. 529611  
Gregory L. Smith, Jr.  
Georgia Bar No. 658369  
JACKSON LEWIS LLP  
1900 Marquis One Tower  
245 Peachtree Center Avenue, N.E.  
Atlanta, Georgia 30303-1226  
Telephone: 404-525-8200  
Facsimile: 404-525-1173

LOCAL COUNSEL:

/s/ Joseph T. Carpenter  
Joseph T. Carpenter  
Alabama Bar No. 5114C59J  
CARPENTER, INGRAM & MOSHOLDER, LLP  
303 Sterling Centre  
4121 Carmichael Road  
Montgomery, Alabama 36106  
Telephone: 334-213-5600  
Facsimile: 334-213-5650

ATTORNEYS FOR DEFENDANT  
BIG LOTS STORES, INC.

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	)	
Defendant.	)	
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	)	

**CERTIFICATE OF SERVICE**

I hereby certify I have served Plaintiff with the foregoing **DEFENDANT BIG LOTS STORES, INC.'S MOTION FOR EXTENSION OF TIME** by causing a copy to be sent via United States mail, first class, to:

Nicole Taylor Reed  
1148 Barley Drive  
Montgomery, AL 36111

This 13th day of February, 2007.

/s/ Joseph T. Carpenter  
Joseph T. Carpenter  
Alabama Bar No. 5114C59J